

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

| | |
|---|------------------------------|
| IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION | MDL No. 2875 |
| THIS DOCUMENT RELATES TO ALL CASES | HON. ROBERT B. KUGLER |

AMENDED NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION

TO: **Jessica M. Heinz, Esq,**
CIPRIANI & WERNER, P.C.
450 Sentry Parkway, Suite 200
Blue Bell, Pennsylvania 19422
Attorneys for Defendants Aurobindo Pharma, Ltd., Aurobindo Pharma USA, Inc., and
Aurolife Pharma, LLC (hereinafter "Defendants").

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition of Dr. A Ram Mohan Rao, Chief Quality Officer, on April 30, 2021, at 8:00 a.m. eastern standard time, and continuing until completion, at Cipriani & Werner, P.C., 450 Sentry Parkway, Suite 200, Blue Bell, Pennsylvania 19422, via Zoom, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632). The witness shall produce the documents requested at Exhibit A, attached hereto, at least 5 days in advance of the deposition.

Pursuant to the meet and confer between the parties, a translator will not be provided.

TAKING ATTORNEY FOR PLAINTIFFS:

Marlene Goldenberg
Ben Stellpflug
GoldenbergLaw, PLLC
800 LaSalle Avenue, Suite 2150
Minneapolis, MN 55402
Telephone: (612) 436-5028
Fax: (612) 367-8107
E-Mail: mjgoldenberg@goldenberglaw.com
bstellpflug@goldenberglaw.com

Ashleigh Raso
Meshbeshier & Spence
1616 Park Avenue
Minneapolis, MN 55404
Telephone: (612) 930-0216
Fax: (612) 339-9188
E-Mail: araso@meshbeshier.com

The videotaped deposition will be taken before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

March 22, 2021

By: /s/Marlene Goldenberg

Marlene Goldenberg
Ben Stellpflug
GoldenbergLaw, PLLC
800 LaSalle Avenue, Suite 2150
Minneapolis, MN 55402
Telephone: (612) 436-5028
Fax: (612) 367-8107
E-Mail: mjgoldenberg@goldenberglaw.com
bstellpflug@goldenberglaw.com

EXHIBIT A

DOCUMENT REQUESTS

1. The most recent resume/Curriculum Vitae and LinkedIn profile for Dr. A Ram Mohan Rao.
2. The complete production of Dr. A Ram Mohan Rao's relevant custodial documents, including those maintained on personal computers or electronic devices, to the extent not produced prior.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

| | |
|---|---|
| IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION | MDL No. 2875 HON. ROBERT B. KUGLER |
| THIS DOCUMENT RELATES TO ALL CASES | |

CERTIFICATE OF SERVICE

I hereby certify that on March 22, 2021, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

By: /s/Marlene Goldenberg

Marlene Goldenberg
Ben Stellpflug
GoldenbergLaw, PLLC
800 LaSalle Avenue, Suite 2150
Minneapolis, MN 55402
Telephone: (612) 436-5028
Fax: (612) 367-8107
E-Mail: mjgoldenberglaw.com
bstellpflug@goldenberglaw.com